

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

Lidio TOLENTINO DE LA CRUZ

Case No. 2:24-mj-103

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 26, 2026 in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:

*Code Section**Offense Description*Title 21 U.S. Code § 841(a)(1) and
(b)(1)(C)Possession with intent to distribute a mixture or substance containing a
detectable amount of methamphetamine

Title 21 U.S. Code § 846

Conspiracy to distribute and possess with intent to distribute a mixture or
substance containing a detectable amount of methamphetamine

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

TFO Jake Heaberlin
 Complainant's signature

Task Force Officer Jake Heaberlin

Printed name and title

Sworn to before me and signed in my presence.

Date: February 27, 2024City and state: Columbus, Ohio

Kimberly A. Johnson

United States Magistrate Judge



AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Jacob Heaberlin, (hereinafter referred to as Affiant) being duly sworn depose and state the following,

INTRODUCTION

1. Your affiant, Jacob Heaberlin, is a Detective with the Franklin County Sheriff's Office assigned to the Drug Enforcement Administration (DEA) Columbus District Office. I have been employed by the Franklin County Sheriff's Office since April 2011, during which time I have worked in the Corrections Division, Training Academy, Patrol Bureau and most recently the Special Investigations Unit. I have participated in numerous investigations while on Patrol and within Special Investigations Unit, with a focus on narcotics possession and distribution.
2. I hold a Bachelor of Science degree from Urbana University (Criminal Justice) and an Ohio Peace Officer Training Academy – Basic Peace Officer certification. Through my career I have received the following specialized training, Patrol Drug Operations, Criminal Interdiction, Street Drug Recognition and Identification and Human Trafficking.
3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement sources and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

PROBABLE CAUSE

4. On February 26, 2024 investigators were conducting surveillance in the area of 6269 Polo Drive West, Columbus, Ohio 43229 (Target Location), the address of a known narcotics trafficker. While on surveillance, a Franklin County Sheriff's Office (FCSO) Special Investigations Unit (SIU), acting in an undercover (UC) capacity, communicated with a known male Hispanic, who resides in Mexico and utilizes a known Mexico based telephone number (Broker).
5. During communications, the UC negotiated an undercover narcotics purchase of five pounds of methamphetamine. The Broker advised that the deal would be completed by a known individual who resides at the Target Location.
6. During surveillance, investigators observed an unknown male exit the Target Location and enter a black Dodge sedan, bearing Ohio registration KGM 4035 (Target Vehicle). Investigators observed the Target Vehicle depart the Target Location and travel to a known address in the area of East Dublin-Granville Road and North Meadows Boulevard. At the same time the Broker sent that location to the UC as the deal location.

7. The UC then requested that the deal location be moved to 1263 East Dublin-Granville Road, Columbus, Ohio 43229 (Deal Location). Investigators then observed the Target Vehicle depart the area of East Dublin-Granville Road and North Meadows Boulevard and travel east toward the deal location.
8. A traffic stop was then conducted on the Target Vehicle by Ohio State Highway Patrol (OSP) for a moving violation in the area of East Dublin-Granville Road and Karl Road, in Columbus, Ohio. During the course of the traffic stop, the driver was identified as Lidio Tolentino De La CRUZ.
9. An OSP Trooper then deployed his K-9 and conducted a free air sniff around the Target Vehicle. The K-9 gave a positive indication to the presence of narcotics coming from the vehicle. A probable cause search of the vehicle was conducted and an orange bag containing five (5), one pound sized packages containing a white crystalline substance was located in the passenger compartment of the target vehicle. The white crystalline substance field-tested positive for methamphetamine.
10. A probable cause search of CRUZ was then conducted and a small plastic baggie containing a crystalline substance was located in the right watch pocket of his jeans.
11. Investigators then transported CRUZ to the Target Location and spoke with his father, who stated he was the renter of the Target Location. Investigators asked for consent to search the Target Location for further evidence of narcotics trafficking. Consent was granted and a consent search was signed. During the search, investigators located suspected methamphetamine, fentanyl and black tar heroin in the bedroom of CRUZ. The suspected methamphetamine field-tested positive for methamphetamine.
12. Based on your Affiant's training, experience and my review of the evidence gathered by investigators during this investigation, there is probable cause to believe Lidio Tolentino De La CRUZ is in violation of Title 21 United States Code §§ 841(a)(1) and (b)(1)(C), possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine. Your Affiant also believes that Lidio Tolentino De La CRUZ is in violation of Title 21 United States Code § 846 conspiracy to possess with intent to distribute and distribute methamphetamine. This affidavit is in support of a request for the issuance of an arrest warrant for Lidio Tolentino De La CRUZ.

Respectfully submitted,

TFO Jacob Heaberlin

Jake Heaberlin

Task Force Officer, DEA

Subscribed and sworn to before me
on February 27, 2024:



Kimberly A. Johnson
United States Magistrate Judge

